

IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MASSACHUSETTS

LIBERTY MUTUAL INSURANCE)	
COMPANY AND SUBSIDIARIES,)	
)	
Plaintiff,)	
)	
v.)	Cnsl. Cv. No. 1:05-11048-RCL
)	
UNITED STATES OF AMERICA,)	
)	
Defendant.)	

LIBERTY MUTUAL FIRE INSURANCE)	
COMPANY AND SUBSIDIARIES,)	
)	
Plaintiff,)	
)	
v.)	Former Cv. No. 1:05-11049-RCL
)	
UNITED STATES OF AMERICA,)	
)	
Defendant.)	

PLAINTIFFS' MOTION TO COMPEL PRODUCTION OF DOCUMENTS

Request for Oral Argument

Plaintiffs Liberty Mutual Insurance Company and Liberty Mutual Fire Insurance Company ("Liberty Companies") respectfully request a hearing regarding the matters addressed in this motion.

Pursuant to Rule 37 of the Federal Rules of Civil Procedure and Rule 37.1 of the Local Rules of the United States District Court for the District of Massachusetts, Liberty Companies hereby move to compel discovery served on defendant on August 25, 2006. Specifically, plaintiffs move that defendant be

compelled to produce the documents demanded in plaintiffs' Request for Production of Documents 6 through 9.

The grounds for this motion are set forth in the accompanying Memorandum In Support Of Plaintiffs' Motion To Compel Production Of Documents.

I hereby certify that I complied with the requirements of Local Rule 37.1 before filing this motion.

Date: 10/27/2006

s/ Peter H. Winslow
PETER H. WINSLOW

Respectfully submitted:

Date: 10/27/2006

s/ Peter H. Winslow
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing *Plaintiffs' Motion to Compel Production of Documents, Memorandum in Support of Plaintiffs' Motion to Compel Production of Documents*, proposed *Order*, and *Appendix A to Memorandum in Support of Plaintiffs' Motion to Compel Production of Documents*, filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to the following address via overnight mail on this 27th day of October, 2006:

Karen Wozniak
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s/ Peter H. Winslow
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